



February 6, 2006  
VIA ECFS

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Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington DC 20554


RE: **City of Bristol, dba Bristol Virginia Utilities (also dba BVU OptiNet, also dba BVUB, also dba OptiNet, also dba BVU)**  
**EB Docket No. 06-36**  
**EB-06-TC-060 - Certification of CPNI Filing (02/06/06)**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 30, 2006, City of Bristol, dba Bristol Virginia Utilities (also dba BVU OptiNet, also dba BVUB, also dba OptiNet, also dba BVU) hereby files a copy of its 2006 Annual Compliance Certification of CPNI as required by section 64.2009(e) of the Commission's rules. As directed by the Public Notice, please include this in EB Docket No. 06-36.

Please contact me at 407-740-3006 or croesel@tminc.com if you have any questions about this filing.

Sincerely,

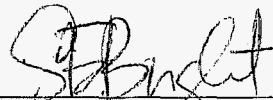
  
Carey Roesel  
Consultant to City of Bristol,  
dba Bristol Virginia Utilities  
Enclosure

cc: Byron McCoy (byron.mccoy@fcc.gov)  
Best Copy and Printing, Inc. (fcc@bcpiweb.com)

**ANNUAL  
OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

I, Stacey E. Bright, certify and state that:

1. I am the Executive Vice President and Chief Financial Officer of BVU and have personal knowledge of BVU's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, BVU's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. A further statement outlining BVU's operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e)



Stacey E. Bright, Executive Vice President & CFO



Date

## ***Exhibit A***

### **Statement of CPNI Procedures and Compliance**

BVU does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If BVU elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

BVU ensures that its employees do not improperly use or disclose CPNI by requiring that all access to CPNI be approved by a supervisor with knowledge of the FCC's CPNI requirements.

BVU has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

BVU maintains a record of all sales and marketing campaigns that use CPNI.

BVU maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.